

OA 91 Criminal Complaint

## United States District Court

NORTHERN

DISTRICT OF

UNITED STATES OF AMERICA

V.

CHRISTOPHER B. REYNOLDS

CRIMINAL COMPLAINT

3 07 70665

Case Number:

ORIGINAL

BZ

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state that the following is true and correct to the best of my knowledge and belief. On or about November 6, 2007 in San Francisco County, in the Northern District of California defendant(s) did,

(Track Statutory Language of Offense)

SEE ATTACHMENT

in violation of Title 18 United States Code, Section(s) 2113(a) & (d)

I further state that I am a(n) Special Agent, FBI and that this complaint is based on the following facts:

Official Title

SEE ATTACHED AFFIDAVIT MADE A PART HEREOF

PENALTIES: Imprisonment for not more than twenty (25) years and/or a fine of not more than two-hundred fifty thousand (\$250,000.00) dollars, a one-hundred (\$100.00) dollar special assessment, five (5) years supervised release, and restitution.

Continued on the attached sheet and made a part hereof:

☒ Yes ☐ NoApproved  
As To  
Form:

AUSA

Name/Signature of Complainant

Sworn to before me and subscribed in my presence,

Date

at San Francisco, California

City and State

HONORABLE BERNARD ZIMMERMAN U.S. MAGISTRATE JUDGE

Name &amp; Title of Judicial Officer

Signature of Judicial Officer

**ATTACHMENT TO CRIMINAL COMPLAINT**

**COUNT ONE:**

On or about November 6, 2007, in the City and County of San Francisco, in the State and Northern District of California, CHRISTOPHER B. REYNOLDS, did knowingly and by force, violence, and intimidation, take from an employee of the Wells Fargo Bank, 1900 Union Street, San Francisco, California, approximately \$9,230 in U.S. Currency in the care, custody, control, management and possession of Wells Fargo Bank, the deposits of which were and are insured by the Federal Deposit Insurance Corporation (FDIC), and in committing the offense, the defendant, CHRISTOPHER B. REYNOLDS, assaulted and put in jeopardy the lives of employees and customers of the Wells Fargo Bank, by the use of a dangerous weapon and device, to wit, a toy gun; in violation of Title 18, United States Code, Section 2113 (a) & (d)

**PENALTIES:** 25 Years in prison, \$250,000 fine, 5 years supervised release, \$100 Special Assessment, and restitution.

STATE AND NORTHERN DISTRICT OF CALIFORNIA)

) ss. AFFIDAVIT  
CITY AND COUNTY OF SAN FRANCISCO)

I, Brian J. Guy, being duly sworn, depose and state:

1. I am a Special Agent (SA) of the Federal Bureau of Investigation (FBI) and have been employed in that capacity for approximately seventeen (17) years. My primary investigative assignment is the investigation of violent crimes, which includes bank robbery investigations.

2. This affidavit is submitted in support of a criminal complaint against Christopher Reynolds, date of birth, August 25, 1956, on grounds that he committed a violation of Title 18, United States Code, Section 2113(a) & (d) - armed bank robbery. The elements of this offense are as follows: (1) the defendant used force, violence, or intimidation; (2) in taking money belonging to a financial institution; (3) the deposits of that financial institution were then insured by the Federal Deposit Insurance Corporation (FDIC); and in committing the offense, the defendant assaulted or put in jeopardy the life of any person by use of a dangerous weapon or device.

3. In connection with my official duties, I have obtained the following information either through my investigation, other FBI Agents, or San Francisco Police Department (SFPD) Officers.

4. In connection with my official duties, I have participated in the investigation involving the robbery of the Wells Fargo Bank, 1900 Union Street, San Francisco, California on November 6, 2007.

5. On November 6, 2007, at approximately 11:10 a.m., a lone white male adult, hereinafter referred to as the robber, entered the Wells Fargo Bank, 1900 Union Street, San Francisco, California. The robber approached the teller line and asked for the bank manager. The manager approached the robber and the robber held up a badge and said he was with the Department of Justice and would like to speak to him in private. The manager and the robber walked to the end of the teller line to a desk and sat down. The robber placed a black leather briefcase on the desk. The robber told the manager he had set an explosive device in the bank and if the manager attempted to call police, his partner, who was outside the bank, would detonate the device. The robber also said he had a gun and opened up his coat jacket to display it. The robber then told the manager that this was a robbery and told the manager to fill the leather briefcase with \$50 and \$100 bills. The manager asked the robber if he wanted him to fill the bag or get someone else. The robber told the manager to get someone else.

6. The manager then called for another employee. The robber kept telling the manager that no one needed to get hurt. The other employee came over to the manager and the manager told the employee that the bank was getting robbed and to go get \$50 and \$100 bills. The

employee walked away and returned with cash and put it in the briefcase. Included in the money that the employee brought back to the robber was an Electronic Security Device (ESD) and pre-recorded bait bills. The robber told the manager that he needed more money. The employee left again in order to get more money. The robber kept telling the manager that he had the phones tapped. The robber kept reaching into his jacket for his gun and saying he was on a time limit. The employee finally returned with more money, which included another ESD and pre-recorded bait bills, and put it in the briefcase. The robber told the manager to wait five (5) minutes before doing anything. The robber said he had done this a thousand times and nobody needed to get hurt. Prior to leaving, the robber told the manager he was sorry for ruining his day and not to hit the alarms or do anything for five (5) minutes. The robber walked out of the bank and got into a taxi-cab.

7. The employee, who had brought the money to the robber, saw the robber get into a yellow cab with green stripes, cab number 162.

8. The manager provided the following description of the robber:

|           |  |
|-----------|--|
| Race:     | White  |
| Sex:      | Male   |
| Height:   | 5'11" - 6'   |
| Weight:   | 200-220 lbs.   |
| Hair:     | Unknown  |
| Eyes:     | Unknown  |
| Age:      | 40-50  |
| Misc:     | Missing teeth or bad teeth in front  |
| Clothing: | Black suit, white shirt, black tie, silver watch, sunglasses with wire frames, black leather briefcase |
| Tattoos:  | Possible tattoo on left wrist under silver watch.  |

9. An audit conducted immediately after the robbery determined the bank suffered a loss of \$9,230. Included in the loss were two ESD's and \$400 in pre-recorded bait bills. The deposits of the Wells Fargo Bank, 1900 Union Street, San Francisco, California are insured by the FDIC.

10. During the course of the robbery, digital bank surveillance cameras captured images of the robber. The manager reviewed an image taken during the robbery and identified the individual sitting at a desk wearing a black suit as the man who robbed the bank

11. Immediately upon leaving the bank, SFPD began to receive a signal emitting from the ESD's taken by the robber. SFPD Officer Andy Castro tracked the signal to National Cab #162, which was near the intersection of Gough Street and Sacramento Street. Officer Castro saw an older white male adult in the rear passenger seat. Officer Castro and other SFPD officers stopped the cab and took the passenger into custody. While taking the passenger into custody, the passenger spontaneously stated, "I have a fake gun in my pocket, the cab driver had nothing to do with his incident." Officer Castro then located the ESD's in a leather briefcase on the back floor of the passenger seat along with a large amount of U.S. Currency. The passenger refused to



identify himself to the officers. SFPD Inspector Dan Gardner arrived on the scene and immediately recognized the passenger as Christopher Reynolds, a prior bank robber who is a federal fugitive. Reynolds acknowledged his identity when confronted by Inspector Gardner.

12. Following his arrest, Reynolds was taken to the Hall of Justice, 850 Bryant Street, San Francisco, California to be interviewed. Prior to interviewing Reynolds, I advised Reynolds of his Miranda rights. Reynolds waived his rights and agreed to be interviewed.

13. Reynolds admitted to me that he robbed the bank. Reynolds said he robbed the bank to survive and gamble. Reynolds used the fake badge and Department of Justice identification to corral the manager. Reynolds dressed in a suit to look like an agent. Reynolds said he did not intend to hurt anyone. Reynolds said he only flashed the gun momentarily to the manager. Reynolds bought the fake gun in a toy store and then painted it black. Reynolds said he got out of federal prison in July 2007, and instead of reporting to San Francisco to start his supervised release, went to Buffalo, New York. Reynolds then admitted to robbing a bank in Buffalo, New York in October 2007, the same way he robbed the bank in San Francisco.

14. Reynolds was given a copy of a bank surveillance photograph taken from the Wells Fargo Bank which depicts him robbing the bank. Reynolds initialed and dated the photograph signifying it was him in the photograph.

15. An audit was conducted of the money found in the leather briefcase in the possession of Reynolds. \$9,110 was recovered from the briefcase, to include \$400 in pre-recorded bait bills along with two (2) ESD's. The pre-recorded bait bills match the list of pre-recorded bait bills from the Wells Fargo Bank, 1900 Union Street, San Francisco, California.

16. A criminal history inquiry was conducted on Reynolds. Reynolds has a prior 1997 federal conviction for armed bank robbery. There is also an active federal arrest warrant outstanding for Reynolds for a supervised release violation.

17. Christopher B. Reynolds is a white male adult, date of birth August 25, 1956, 6'1", 180 pounds, auburn hair, hazel eyes, FBI # 208512VA2.

18. Based upon the above information, there is probable cause to believe that Christopher B. Reynolds, date of birth August 25, 1956, did commit the robbery of the Wells Fargo Bank, 1900 Union Street, San Francisco, California on November 6, 2007 in violation of Title 18, United States Code, Section 2113 (a) & (d) - armed bank robbery.



BRIAN J. GUY, Special Agent,  
Federal Bureau of Investigation

SWORN AND SUBSCRIBED TO BEFORE ME  
THIS 8 DAY OF NOVEMBER 2007



Bernard Zimmerman  
United States Magistrate Judge